

JS 44 (Rev. 09/11)

**CIVIL COVER SHEET**

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Natalie Munroe

**DEFENDANTS**

Central Bucks School District; N. Robert Law; and Abram Lucabaugh

(b) County of Residence of First Listed Plaintiff Bucks Co.

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Bucks Co.

(IN U.S. PLAINTIFF CASES ONLY)

NOTE:

IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (If Known, Address, and Telephone Number)  
Stanley B. Cherkov, 261 Old York Road, Suite 503, Jenintown, PA 19046  
215-572-8600

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. Section 1983

Brief description of cause:

First Amendment Retaliation Case

**VII. REQUESTED IN COMPLAINT:**
☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

5,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

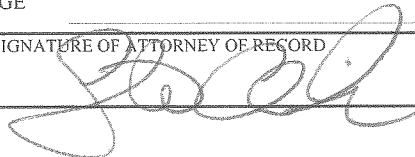
JUDGE

DOCKET NUMBER

DATE

6/21/12

SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM** to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 1226 Irma Road, Warminster, PA 18974

Address of Defendant: 20 Welden Drive, Doylestown, PA 18901

Place of Accident, Incident or Transaction: Doylestown, PA  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes ☐ No ☒

CIVIL: (Place in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☒ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

**ARBITRATION CERTIFICATION**

(Check appropriate Category)

I, Stanley B. Cheiken, Esquire, counsel of record do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☒ Relief other than monetary damages is sought.

DATE: 6/21/12

[Signature]  
Attorney-at-Law

62106

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 6/21/12

[Signature]  
Attorney-at-Law

62106

Attorney I.D.#

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

NATALIE MUNROE.,

Plaintiff,

v.

CENTRAL BUCKS SCHOOL DISTRICT, ET AL.,

Defendants.

**CIVIL ACTION**

**No.**

**JURY TRIAL DEMANDED**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( x )

6/21/12  
Date

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Attorney for Plaintiff

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Email Address

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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NATALIE MUNROE,  
1226 Irma Road  
Warminster, PA 18974,

Plaintiff,

v.

CENTRAL BUCKS SCHOOL DISTRICT  
20 Welden Drive  
Doylestown, PA 18901,

-and-

N. ROBERT LAWS  
SUPERINTENDENT OF SCHOOLS  
CENTRAL BUCKS SCHOOL DISTRICT  
40 John Dyer Way  
Doylestown, PA 18902,

-and-

ABRAM LUCABAUGH  
PRINCIPAL  
CENTRAL BUCKS HIGH SCHOOL EAST  
7 Timber Brook Drive  
Quakertown, PA 18951,

Defendants.

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**CIVIL ACTION**

**No.**

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Natalie Munroe, by and through undersigned counsel, hereby brings this Complaint against defendants Central Bucks School District, N. Robert Laws, and Abram Lucabaugh, and avers as follows:

**PARTIES**

1. Plaintiff Natalie Munroe ("Munroe") is an adult individual and a citizen of the

Commonwealth of Pennsylvania residing at 1226 Irma Road, Warminster, PA 18974.

2. Defendant Central Bucks School District (hereinafter the “School District”) is organized and existing as a political subdivision under the laws of the Commonwealth of Pennsylvania. At all times relevant hereto, the School District was responsible for the education of approximately 20,000 students and operated 15 elementary schools, 5 middle schools and three high schools, including Central Bucks High School East in Doylestown, PA. The School District’s administrative offices are located at 20 Welden Drive, Doylestown, PA.

3. Defendant N. Robert Laws (“Laws”) is an adult individual and a citizen of the Commonwealth of Pennsylvania residing therein at the address set forth in the caption. At all times relevant hereto, defendant Laws has been the Superintendent of Schools of the School District.

4. Defendant Abram Lucabaugh (“Lucabaugh”) is an adult individual and a citizen of the Commonwealth of Pennsylvania residing therein at the address set forth in the caption. At all times relevant hereto, defendant Lucabaugh has been the Principal of Central Bucks High School East.

### **JURISDICTION**

5. Munroe invokes the jurisdiction of this Court pursuant to 28 U.S.C. §1331 (Federal Question Jurisdiction); and 28 U.S.C. §1343 (Civil Rights).

### **VENUE**

6. Venue in this action lies in this judicial district, pursuant to 28 U.S.C. §1391(b), the events giving rise to Munroe’s claims having occurred herein.

### **FACTS**

7. In 2006, Munroe was hired by the School District as an English Teacher at



Central Bucks East High School.

8. At all times relevant hereto, Munroe performed her job in an excellent fashion.
9. In 2010, Munroe received tenure.
10. Prior to the events giving rise to this lawsuit, Munroe received excellent feedback and performance evaluations.
11. Indeed, in June 2008, defendant Lucabaugh wrote a letter of reference in support of Munroe's application to a Master's in Education program in which he stated, *inter alia*:

Over the course of the last two years, I had a chance to work with Natalie as a direct supervisor of the English department. As a classroom teacher, Natalie is fantastic. She is articulate, creative, well-versed in her subject matter, and particularly astute in dealing with a wide variety of learning styles, demonstrating an ability to motivate even the most reluctant of learners; additionally, she not only holds herself to high expectations, but fully expects her students and colleagues to reflect the meticulous, conscientious manner in which she approaches each aspect of her chosen profession.

Natalie Munroe is a woman of utmost integrity, character, and intelligence. She is a consummate educator with a sparkling future, and a woman whom I respect both personally and professionally. I am honored to know and work with Natalie, and am absolutely certain she will represent your ideals of what a graduate student at Gratz should be.

12. In or about August 2009, Munroe created a blog entitled *Where are we going, and why are we in this handbasket?*
13. Munroe's blog was intended as a vehicle to keep in touch with friends. In her blog, Munroe discussed such mundane topics as her favorite restaurants, family trips, and her work experiences.
14. Munroe intended for the blog to be anonymous, except as to her friends who she invited to be blog "followers." Thus, she blogged under the name "Natalie M" and she avoided

making any reference to the locations where she lived and worked, the names of her students, and the name of the school where she taught.

15. In February 2011, when the blog came under scrutiny by the School District, the blog had merely nine (9) followers, two of whom were Munroe and her husband.

16. Munroe published 84 blog entries between August 9, 2009 and November 25, 2010, most of which had nothing to do with her school or work.

17. At no time during this period did the School District have any policy restricting an employee's ability to maintain a blog.

18. At all times, Munroe's activity in blogging was undertaken as a private citizen.

19. Therefore, Munroe's blogging activity was protected under the First Amendment of the United States Constitution.

20. On February 9, 2011, defendant Lucabaugh asked to meet with Munroe. At that time, he showed Munroe several printed copies of her blog entries and asked her whether she was the author of them. Among the blog entries in questions, were entries in which Munroe made comments about her students' unwillingness to work hard and cooperate in school, lack of student accountability, and the lack of support for teachers shown by school administrators and parents.

21. Munroe acknowledged to Lucabaugh that she had authored the blogs.

22. In retaliation for Munroe's protected free speech in publishing her blog:

a. Lucabaugh instructed Munroe to gather her belongings, whereupon she was escorted from the building by Lucabaugh and a school security guard; and

b. defendants immediately suspended Munroe from her job.

23. Later that day, and in the weeks that followed, Munroe's blog became the subject

of local, national, and international press coverage, in print, as well as on radio and television.

24. Defendants Laws and Lucabaugh were reported in the press as having stated that Munroe was suspended, and would likely be fired, for having made “egregious” statements about students in her blog.

25. Munroe defended herself and her conduct in her blog, as well as in the media.

26. In February 2011, Munroe appeared on CBS, ABC, NBC, CNN, Fox News, and other television stations; and Munroe gave interviews to Time Magazine, Reuters, the Associated Press, the Philadelphia Inquirer and other print news sources.

27. In each appearance and interview, Munroe defended her blog entries, refused to apologize for the comments made on her blog, and attempted to focus attention on the education debate, pointing out that school administrators and government official often fail to support teachers, choosing instead to placate unreasonable parents and unmotivated students, and thereby undermining the educational system.

28. At all times, Munroe’s activities in continuing to blog, as well as in speaking to the media, were undertaken as a private citizen. Accordingly, these activities were protected under the First Amendment of the United States Constitution.

29. In retaliation for Munroe’s protected free speech:

a. In June 2011, Munroe was given a retaliatory and false unsatisfactory performance evaluation by defendant Lucabaugh. Lucabaugh predicated his unsatisfactory evaluation on Munroe’s protected blogging activity, stating “Teacher failed to exhibit acceptable and professional language on an internet blog.”

b. defendants refused to grant Munroe’s requests for a transfer to another school in the School District.



c. On August 3, 2011, defendants held a press conference in which defendant Lucabaugh stated, “Despite the fact that Mrs. Munroe retains legal employment rights, I would hope that none of us lose sight of the real issue. The real issue is that while something may be legally right, it may not be ethically or morally right. There are consequences that occur when a person chooses to exercise her rights and say outrageous, disrespectful, vulgar and cruel things about other people . . . especially when it’s a teacher saying terrible things. . . .”

d. In August 2011, defendants informed School District residents that they would honor all requests of students to “opt out” of Munroe’s classes.

e. In September 2011, defendants placed Munroe on a performance “improvement plan” allegedly necessitated by the retaliatory and false unsatisfactory performance evaluation.

f. Commencing in October 2011, defendants began retaliatory, unannounced observations of Munroe’s classes. Following the unannounced evaluations, defendants would subject Munroe’s classroom efforts to ridiculous and overly critical evaluations, routinely concluding that lessons which Munroe had been teaching for years were unsatisfactory.

g. On October 12, 2011, defendant Lucabaugh sent Munroe a retaliatory disciplinary email calling her unprofessional for briefly leaving her classroom to use the restroom while her students were quietly reading. Munroe was singled out for this discipline while other teachers who used the restroom in this fashion were not disciplined.

h. On or about October 28, 2011, allegedly on the basis of four unsatisfactory classroom evaluations, defendants instructed Munroe to begin submitting daily lesson plans using a template designed by the School District. The sole purpose of this requirement was to retaliate against Munroe for her protected free speech. Indeed, other teachers were not required

to submit daily lesson plans. Moreover, defendants knew that it would be difficult, if not impossible, for Munroe to comply with this instruction because of the time and effort that is required to prepare a lesson plan using the School District's template. Additionally, Munroe had already made her existing lesson plans, in the format that she had been using for years, available to School District evaluators.

i. Throughout the fall semester of 2011, defendants continuously created a harassing and hostile work environment for Munroe, undermining her ability to teach by repeatedly observing her classroom, requiring Munroe to make unnecessary changes to her lesson plans, and requiring her to attend multiple, lengthy meetings wherein she was subjected to retaliatory, negative evaluations. Defendants' conduct in this regard was transparently obvious – they were hoping to make Munroe's job so difficult that she would quit.

j. On January 20, 2012, defendants issued Munroe a retaliatory second unsatisfactory performance evaluation.

k. Throughout the spring semester of 2012, defendants continued to subject Munroe to retaliatory classroom evaluations, singling her out for ridiculous and untrue criticism at every opportunity. Munroe's colleagues began to refer to the treatment she was being subjected to as the administration's "spring push."

l. During this period, Munroe had multiple meeting with defendant Lucabaugh in which he refused remove the School District's requirement that Munroe submit daily lesson plans despite the fact that Munroe clearly articulated that it was impossible (because there were not enough hours in the day) for her to comply with this unreasonable instruction.

m. On June 1, 2012, defendants issued Munroe a retaliatory third unsatisfactory performance evaluation. At that time, Munroe was notified that defendant intend

to recommend the termination of her employment contract at the meeting of the Central Bucks Board of School Directors scheduled for June 26, 2012.

**COUNT I**  
**42 U.S.C. §1983**  
**Plaintiff vs. Defendants**

30. The averments contained in paragraphs 1 through 29 above are incorporated by reference as though fully set forth herein.

31. Under color of state law, defendants School District, Laws and Lucabaugh have deprived Munroe of her First Amendment Constitutional rights by harassing and retaliating against her as aforesaid.

32. As a result of defendants' conduct, Munroe has suffered and will continue to suffer monetary damages, including lost wages and benefits.

33. As a result of defendants' conduct, Munroe has suffered emotional distress, embarrassment, humiliation and damage to her reputation and earning capacity.

34. The conduct of defendants Laws and Lucabaugh is extreme and outrageous thereby justifying the imposition of punitive damages.


**WHEREFORE**, Plaintiff Natalie Munroe respectfully requests that this Honorable Court:

- a. Enter an Order reinstating Munroe to her employment with School District with full benefits and emoluments of employment retroactive to the date of her termination.
- b. Award Munroe backpay, front pay, compensatory damages and such other monetary damages as Munroe proves at trial.
- c. Award Munroe punitive damages against defendants Laws and Lucabaugh

d. Award Munroe her costs, including expert witness fees and reasonable attorney's fees.

e. Grant such other relief as the Court deems just and proper.

Date: June 20, 2012

  
\_\_\_\_\_  
STANLEY B. CHEIKEN, ESQUIRE

The Pavilion – Suite 503  
261 Old York Road  
Jenkintown, PA 19046  
(215) 572-8600

Date: June 20, 2012

  
\_\_\_\_\_  
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*Attorneys for Natalie Munroe*